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April 5, 2024

By ECF

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 1305  
New York, NY 10007

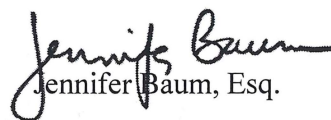
Re: Swett Urquieta v. Bowe, 24-cv-1379 (SDNY) (PAE)  
(Letter Motion to File Sealed Exhibit)

To the Court:


I write as the Court-appointed attorney for the minor child S.B.S. in the above-entitled action, pursuant to this Court's Individual Rules and Practices in Civil Cases (rev. 2021) Rule 4.B.2., seeking Court approval to file a Summary of the Child's Position, discussed at yesterday's Conference, in redacted form in its entirety.

The proposed filing relates directly to the child's upcoming *in camera* testimony, which itself will be sealed. Permitting indiscriminate public inspection of the proposed filing describing that expected testimony is neither warranted nor advised, for the health and safety of the eleven year old child, who is not a party to this action, and who has already expressed, through counsel, significant anxiety and embarrassment over the possibility of public inspection of this case and its record. This Court has already recognized the need to protect the child from public scrutiny during his testimony about the deeply personal family and health matters that are the subject of this litigation, by Ordering that his actual testimony be shielded from the public. The requested redaction merely extends that same protection to this non-evidentiary summary of that expected testimony. *See, Robinson v. De Niro*, 2023 WL 3728350 (SDNY), \*2 (permitting redaction of documents that could be used to significantly intrude on personal privacy interests, especially in cases that attract media attention and involve innocent third parties such as non-party children).

Respectfully,

  
Jennifer Baum, Esq.

GRANTED.  
SO ORDERED.

  
PAUL A. ENGELMAYER  
United States District Judge  
April 5, 2024